

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

-VS-

No. CR-24-125-JD

OLUKAYODE ADURAGBENRO OJO

Defendant.

UNITED STATES' PROPOSED VOIR DIRE QUESTIONS

The United States respectfully requests that the Court include in its voir dire the following questions in addition to the questions usually asked by the Court:

1. Have you or any members of your family ever been involved in a dispute or legal action with the United States government, or with any of its agencies, officers, or employees?
2. How would you describe your attitudes or beliefs about men and women who have chosen law enforcement as their profession?
3. Would you tend to disbelieve the testimony of a witness merely because that witness is a law enforcement officer or individual who is assisting law enforcement officers?
4. Does any juror have any religious, moral, or philosophical reservations about sitting as a juror in a criminal case, or returning the verdict of guilty, if such is supported by the evidence?
5. Do you know the defendant, Olukayode Aduragbenro Ojo, his attorney Ronald C. Jones, II, Assistant United States Attorneys Jackson D. Eldridge or Matthew

Dillon, Transportation Security Administration Inspector Jeffrey Schmitz, or any of the participants or witnesses in this trial?

6. Have you or any member of your family ever had any experience with law enforcement or the courts that would cause you to be biased against them?
7. This case was investigated by the Transportation Security Administration. Have you or any member of your family or any close personal friend had any experience or dispute with the Transportation Security Administration that left you with bad feelings or that could prejudice you against the Government?
8. Have you or any members of your family or any close personal friend had any experience or dispute with the Transportation Security Administration that left you with bad feelings or that could prejudice you against the Government?
9. Have you or any members of your family or any close personal friend been the victims of or witnesses to a crime? What type of crime? Were you satisfied with the way police or law enforcement officers handled the matter?
10. Have you or any members of your family ever applied for federal employment? Or submitted an application for any kind of federal program or certification?
11. This is a criminal trial. Your duty, as jurors, will be to determine whether or not the defendant is guilty of the crimes charged in the indictment based on the evidence in the case. It is my duty, as Judge, to determine what punishment, if any, may be imposed in the event of a guilty verdict. Would you be able to assess the evidence in this case and render a verdict without consideration as to the type of sentence or punishment which ultimately may be imposed as a result of your verdict?
12. There are two types of evidence that you will be asked to consider in this case; one is direct evidence and the other is circumstantial evidence. Direct evidence comes from witnesses who can describe what they saw and heard. Circumstantial evidence is testimony or a document that gives you a reasonable basis for drawing a conclusion about what happened. The United States can meet its burden to prove the defendant guilty either by direct evidence or by circumstantial evidence. Do

you have any problem with that? Would any of you have a problem giving equal consideration to circumstantial evidence? Would any of you refuse to convict if proof of the defendant's guilt was based in part on circumstantial evidence?

13. Have you previously been called to jury service? Did you actually sit as a juror? Civil or criminal case? What jurisdiction? What was your verdict?
14. Was there anything about prior jury service that would cause you to be biased in any way in this case?
15. Do you watch television crime shows such as CSI? If so, do you believe these shows accurately reflect the investigatory resources and techniques available to law enforcement agencies?

Respectfully submitted,

ROBERT J. TROESTER
United States Attorney

s/Jackson D. Eldridge
Assistant United States Attorney
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CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2024, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant: Ronald C. Jones, II

s/Jackson D. Eldridge
Assistant United States Attorney